

LPC# 0971405029 - Lake County  
Waukegan Speedway, Park City, IL  
ILN000520523  
SF/HRS

# **CERCLA Preliminary Assessment**

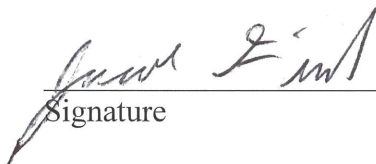


Prepared by:  
Office of Site Evaluation  
Division of Remediation Management  
Bureau of Land

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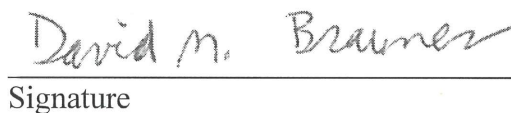
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Signature

6/7/2021  
Date

**Approval:** David Brauner, Site Assessment Manager, United States Environmental  
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Signature

5/18/21  
Date

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**CERCLA  
Preliminary  
Assessment**

**for:**

**Waukegan Speedway  
Park City, Illinois  
ILN000520523**

**PREPARED BY:  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF LAND  
DIVISION OF REMEDIATION MANAGEMENT  
OFFICE OF SITE EVALUATION**

**January 29<sup>th</sup>, 2021**

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# **PRELIMINARY ASSESSMENT**

(January 10<sup>th</sup> 2021)

## **Section 1.0 Introduction**

On February 14<sup>th</sup>, 2020, the Illinois Environmental Protection Agency's (Illinois EPA) Office of Site Evaluation received funding from the United States Environmental Protection Agency (U.S. EPA) Region V to conduct a Pre-CERCLA Screening (PCS) at the Waukegan Speedway (The Site) in Park City, Lake County, Illinois. The center of the site is located at +42.35425 Latitude and -87.8827 Longitude. The address for the site is 3300 Roger Ave. Park City IL, 60085. The site is in congressional district 10.

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR Part 300) requires that a Preliminary Assessment be performed on all sites entered into the SEMS (Superfund Enterprise Management System) remedial assessment active site inventory, U.S. EPA's inventory of hazardous waste sites.

A Preliminary Assessment is an early step in the Superfund process that utilizes a limited-scope investigation and collects readily available information. The Preliminary Assessment distinguishes between sites that pose little or no threat to human health and the environment and those that require further investigation. The Preliminary Assessment also supports emergency response and removal activities, fulfills public information needs, and generally furnishes appropriate information about the site early in the assessment process.

If the findings of the Preliminary Assessment determine that further investigation is warranted, the site will continue to progress through the Superfund evaluation process and receive a Site Inspection. The Site Inspection will provide necessary information that will help determine if the site qualifies for possible inclusion on the National Priorities List (NPL) or should be archived and receive a No Further Remedial Action Planned (NFRAP) qualifier. At any time throughout the Superfund evaluation process, the site

may be assigned NFRAP status, be referred to another state or federal clean-up program, or recommended for another action. The Preliminary Assessment is performed under the authority of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) commonly known as Superfund.

## **Section 2.0 Site Description and History**

### **Section 2.1 Site Description**

The center of the site is located at +42.35425 Latitude and -87.8827 Longitude. The address for the site is 3300 Roger Ave. Park City IL, 60085. The site is in congressional district 10. See figure 1 and figure 3. The Waukegan Speedway is currently a residential neighborhood known as Farmington Estates owned and operated by Zeman Homes.

### **Section 2.2 Site History**

The Waukegan Speedway was operated from 1949 to 1979. The speedway started off as a quarter mile dirt track, then in November 1968 the track was paved. The track remained paved until 1978 when it was returned to dirt and the last race was in September 1979. Gordon Sill was the promoter from 1963 until the track closed in 1979. (“kalracing.com”) According to the 2019 Limbrunner landfill report the track pavement was pushed into the wetland area presumably in 1978 when it was returned to a dirt track. After the racetrack closed in 1979 it is not known what was done with the property prior to 1985 when the new PIN number was created.

Using figure 5 and the lake county assessor’s office website it was determined that pin # 0830100011 was the pin that the site was located on. According to the Lake County tax assessor’s office pin# 0830100011 was created in 1985 by the consolidation of pin #’s 0830100005, -007, and -010. So the ownership will start in 1985. Ownership of the parcel was as follows: at the time of consolidation in 1985 was the First National Bank of Waukegan, 7/8/1987 Roger T and Susan M Larson, 7/10/1987 Thomas J Schwartz,

7/12/1987 Bruce C Strohm, 7/14/1987 Parkway Bank & Trust Co, and 6/22/2004 to current day Farmington Estates LLC.

The Waukegan Speedway site was placed into SEMS after an investigation in 2019 on a site bordering the north (Limbrunner Landfill). During this investigation sample X101 was taken to the south of the Limbrunner Landfill boundary in Farmington Estates Trailer Park, revealing 11 mg/kg of Aroclor 1254. This sample is just on the northern edge of where the former parking lot was for the Waukegan Speedway. During an inspection in 1978, fly ash saturated with waste oil was found dumped at the northern end of the Waukegan Speedway, which is now a residential area. According to the Illinois EPA inspectors, the fly ash potentially came from Abbott labs while the waste oil potentially came from either Rowe Oil or the former OMC. (IEPA, Limbrunner 2019)

### Section 2.3 Previous Investigations

A phase 1 investigation was performed by NOVA consulting for BERKADIA COMMERCIAL REAL ESTATE, LLC. This investigation was performed when Zeman Homes put new debit on the property in 2016. This investigation was a research only investigation with no sampling involved. (Nova, 2016)

The only CERCLA investigation performed on this site was a Pre-CERCLA Screening (PCS) done in December 2020. The PCS noted the Poly-Chlorinated Biphenols (PCB's) found by the 2019 Limbrunner landfill sampling event. The PCB's were found above the SCDMS value of 1 mg/kg in the residential area causing the creation of the Waukegan Speedway site from the Limbrunner landfill site due to different sources. The site was entered into SEMS and is eligible for further assessment.

## **Section 2.4 Regulatory Status**

Based upon available file information the Waukegan Speedway does not appear to be subject to Resource Conservation and Recovery Act (RCRA) corrective action authorities. Information currently available does not indicate that the site is under the authority of the Atomic Energy Act (AEA), Uranium Mine Tailings Action (UMTRCA), or the Federal Insecticide Fungicide or Rodenticide Act (FIFRA).

## **Section 3.0 Field Inspection Activities**

### **Section 3.1 Field Inspection**

Site reconnaissance was performed in conjunction with the 2019 Limbrunner Landfill SR with sampling. The homes all generally look to be well kept trailers and manufactured homes without basements or crawl spaces. The yards are all well kept with very few bare spots. The area in general is flat with a slight downhill gradient towards the wetland in the east.

### **Section 3.2 Analytical Data**

During the 2019 Limbrunner landfill sampling event 4 samples were taken within the yards of homes located at Farmington Estates. In Figure 4 the results are shown for each location that was above 3 times background. Location X101 was 11 mg/kg and is located to the north of the Waukegan Speedway in the former parking lot.

## **Section 4.0 Source Discussion and Pathway Analysis**

The CERCLA Hazardous Ranking System (HRS) has three migration pathways and one exposure pathway that are evaluated during site assessments. The sites are evaluated based on the known or potential impact the pathways have on the environment and human health. This section will evaluate the groundwater, surface water, and soil exposure pathways. The air migration pathway will not be included below, as it is not of concern at this site.

## Section 4.1 Source discussion

The former speedway area is now a trailer park known as Farmington Estates managed by Zeman Homes. In 1978, fly ash saturated with waste oil was found dumped at the northern end of the Waukegan Speedway. The waste oil potentially came from either Rowe Oil or the former OMC. Waste oil from this time period was known to have PCB's in it. This PCB contamination was confirmed with testing during the 2019 Limbrunner landfill sampling event. The 2019 samples show PCB contamination at three times background within Farmington Estates. Figure 5 shows the location of the Waukegan speedway in conjunction with the homes that are now present. Using GIS and figure 5 the Waukegan speedway was 6.9 acres in size. Using figure 5 and us census data for Lake County it is determined that 57 homes with 2.8 People per home equals 160 people potentially affected by the Waukegan Speedway Area along with a recreational playground on the south end of the Former Speedway.

## Section 4.2 Groundwater

The Illinois State Geological Survey of the region indicate that glacial drift deposits in the area vary in thickness from approximately 90 feet east to 300 feet towards the western edge of Lake county. Beneath the drift, and hydrologically connected to the drift, are upper bedrock formations consisting mainly of beds of dolomite and shale which dip easterly at about 10 to 15 feet per mile. This unit is the Silurian dolomite and referred to as the shallow dolomite aquifer system, encountered at depths from 90 feet to 300 feet. Thickness ranges from almost zero west to about 200 feet east. Water may be obtained from cracks and crevices within this formation. Underlying the Silurian dolomite is the Maquoketa Group composed primarily of non-water-bearing shales (considered a confining layer in this case) that separate the Silurian dolomite aquifer from deeper water-bearing units. These shales lie at depths about 200 feet west to 400 feet east and range in thickness from 250 feet to 100 feet east. Below this group, a sequence of hydrologically connected sandstones and dolomites exist. This aquifer is the Cambrian-Ordovician aquifer into which most wells within four miles of the site are drilled. Wells drilled through the Maquoketa shale most likely would not be subject to contamination from this facility as there is presently no evidence that this aquifer is hydrologically

connected to the upper sand-gravel and dolomite aquifers. The deeper aquifers that are above the Maquoketa Group are hydrologically connected to the shallow glacial drift deposits (ISWS, 1976).

The residents on site have drinking water supplied to them from the municipality (Park City). Park City sources its drinking water from the City of Waukegan, who uses two surface water intakes (Illinois EPA #01516 and #01517) on Lake Michigan (Figure 6). The two intakes are the primary source of drinking water for several cities around Waukegan with a total population served of 88,182. This CWS has met the drinking water standards. (Illinois Drinking Water Watch)

Waukegan Speedway is surrounded by many wells but most of them are “engineering” monitoring wells that are not used for drinking water purposes. Figure 6 shows this graphically from the site out to the 4-mile target distance limit (TDL). The community water supply (CWS) wells are all abandoned within 1 mile of the site but there are some CWS wells that are in the 1 to 4-mile range that are listed as the emergency standby wells. All residence of Lake County IL who have access to public water are required to connect to the water facilities and seal any private wells previously used (Lake County Public Works Water Use Ordinance). Due to the lack of groundwater use the groundwater pathway was not evaluated using HRS.

### Section 4.3 Surface Water

The site and surrounding areas are generally flat with a slight downhill gradient towards the east wetland known as the Daddy Slough Wetland (see Figure 2 and figure 7). There is little vegetation on the site with exception to the edges due to the site being a active trailer park receiving yard maintenance and being bordered to the east by a wetland.

According to the 2018 Limbrunner landfill site reassessment, once the surface water within the wetland area east of the site reaches a certain height, the water discharges through an outlet control structure and travels through an unidentified series of culverts trending southward through multiple wetland areas approximately three miles before

entering the Skokie River. Following discharge through the outlet control structure, this portion of the surface water flow pathway is again considered to be intermittent overland flow and therefore not a part of the 15-mile target distance limit. The 15-mile target distance limit starts once the surface water is no longer intermittent at the Skokie river. If completed, the surface water pathway would reach the 15-mile Target Distance Limit in the Skokie River on the southern municipal boundary of Highland Park, Illinois. See figure 7. Due to the intermittent nature of the beginning of the surface water pathway and the decreased likelihood of contamination migrating, this pathway is not of concern.

The Lake County Stormwater Management Commission (SMC) is currently working on a potential project (referred to as the “Daddy Slough Public Flood Control and Wetland Enhancement Project”) that would create flood storage in the current wetland area southeast of the Limbrunner Landfill site. Part of the plan involves excavation in portions of the wetland located southeast of the site. (SMC, 2017).

No fisheries are suspected to be found within the surface water pathway; the intermittent nature of drainage ditch does not support fish. No information was obtained to indicate that local populations catch and consume fish from within the wetland east of the site (thickly vegetated banks which would inhibit most people from bank or boat fishing). 143 state endangered and threatened species are known to be in Lake county according to the Illinois Threatened and Endangered Species by County by the Illinois Natural heritage database. No species were identified during this assessment but that does not exclude the possibility that they are present.

## Section 4.4 Soil Exposure and Subsurface Intrusion

### Section 4.4.1 Soil Exposure

Soil exposure is the pathway of concern at this site. The site is made up of approximately 57 homes, and using the Lake county census data of 2.8 people, that equals 160 people residing on the former speedway area. There are no schools or daycares known within 200 feet of the site. There is a playground just off site to the south



of the speedway. During the 2019 Limbrunner landfill sampling event, a sample was taken on the north east corner of where the Waukegan speedway was located, this sample contained 11 mg/kg of PCB's which is above both the cancerous and noncancerous SCDM values resulting in a Level 1 exposure using the HRS guidance. The results were shared with the Illinois Department of Public health (IDPH). The residents where the samples were taken, were informed of the results and the appropriate actions to take to reduce their exposure to the contaminants found in the samples.

Distance	Population
0 - 0.25	2988
0.25 - 0.50	1708
0.5 - 1	9133
Total Population	13829

#### Section 4.4.2 Subsurface Intrusion

In 2017, the U.S. EPA added the Subsurface Intrusion (SsI) Component to the HRS. This component enables U.S. EPA to consider human exposure to hazardous substances or pollutants and contaminants that enter regularly occupied structures through subsurface intrusion when evaluating a site for placement on the NPL. Subsurface intrusion is the migration of hazardous substances or pollutants and contaminants from the unsaturated zone and/or the surficial ground water into overlying structures (e.g. homes, businesses, schools). While subsurface intrusion can occur through multiple mechanisms, the most common form of subsurface intrusion is vapor intrusion because vapors migrate readily through the subsurface into structures even if the source of the vapors is located well below the base of the structure. As a result, contaminant concentrations in those structures can rise to a point where the health of residents or workers could be at risk.

The revised HRS evaluates both the evidence that contaminants have moved into a living space from the subsurface (observed exposure), and the potential for contaminants to move into a living space from the subsurface (potential exposure). Observed exposure involves chemical analysis or direct observation from within the living space while

potential exposure is based on several factors, including characteristics of the structure, depth to contamination, and vapor migration potential based on subsurface geology and hazardous substance characteristics.

Conditions at the Waukegan Speedway site do not invoke concern for the SsI pathway. Factors that mitigate the concern are the fact that the homes are manufactured housing built up from the ground surface by piers or concrete blocks. The 2019 Limbrunner Landfill sampling event did not find any contaminants in the soil or sediments that would present a SsI issue, e.g. based on their volatility. Past investigations at the site have not attempted to identify observed exposure within in any structures by either direct observation or chemical analysis. The SsI pathway was not evaluated.

## **Section 5.0 Summary**

On February 14<sup>th</sup>, 2020, the Illinois Environmental Protection Agency's (Illinois EPA) Office of Site Evaluation received funding from the United States Environmental Protection Agency (U.S. EPA) Region V to conduct a Preliminary Assessment at the Waukegan Speedway (The Site) in Park City, Lake County, Illinois. The center of the site is located at +42.35425 Latitude and -87.8827 Longitude. The address for the site is 3300 Roger Ave. Park City IL, 60085. The site is in congressional district 10.

A Preliminary Assessment is an early step in the Superfund process that utilizes a limited-scope investigation and collects readily available information. If the findings of the Preliminary Assessment determine that further investigation is warranted, the site will continue to progress through the Superfund evaluation process and receive a Site Inspection.

The center of the site is located at +42.35425 Latitude and -87.8827 Longitude. The address for the site is 3300 Roger Ave. Park City IL, 60085. The site is in congressional district 10. See figure 1 and figure 3. The Waukegan Speedway is currently a residential neighborhood known as Farmington Estates owned and operated by Zeman Homes. The Waukegan Speedway was operated from 1949 to 1979. ("kalracing.com")

The Waukegan Speedway site was discovered during an investigation in 2019 on a site bordering the north (Limbrunner Landfill). During this investigation sample X101 was taken to the south of the Limbrunner Landfill boundary in Farmington Estates Trailer Park, revealing 11 mg/kg of Aroclor 1254. This sample is just on the northern edge of where the parking lot was for the Waukegan Speedway. During an inspection in 1978, fly ash saturated with waste oil was found dumped at the northern end of the Waukegan Speedway, which is now a residential area. According to the Illinois EPA inspectors, the fly ash potentially came from Abbott labs while the waste oil potentially came from either Rowe Oil or the former OMC. (IEPA, Limbrunner 2019)

Soil exposure is the pathway of concern at this site. The site is made up of approximately 57 homes, and using the Lake county census data of 2.8 people, that equals 160 people residing on the former speedway area. There is a playground just off site to the south of the speedway. During the 2019 Limbrunner landfill sampling event, a sample was taken on the north east corner of where the Waukegan speedway was located, this sample was 11 mg/kg which is above both the cancerous and noncancerous SCDM values resulting in a Level 1 exposure according to the HRS guidance.

The pathways that are not of concern are the air, groundwater, and surface water. The air pathway is of little concern due to the good ground cover provided by the manicured lawns and the dense vegetation along the borders of Farmington Estates. The groundwater pathway is also of little concern due to the lack of use. Park City receives its water from lake Michigan and its residents are required to hook up to public water supply and seal off any private wells. The surface water pathway is also of little concern because of the intermittent nature of the pathway.

## Section 6.0 References

[http://www.kalracing.com/Autoracing/Waukegan\\_Speedway\\_History.htm](http://www.kalracing.com/Autoracing/Waukegan_Speedway_History.htm) , Visited 12/25/2020

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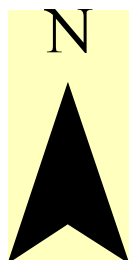
**Figure 1**  
**Waukeegan Speedway Site Location**



**Legend**

-  Waukeegan\_Speedway\_Point
-  County
-  State Outline

0 37.5 75 150 Miles



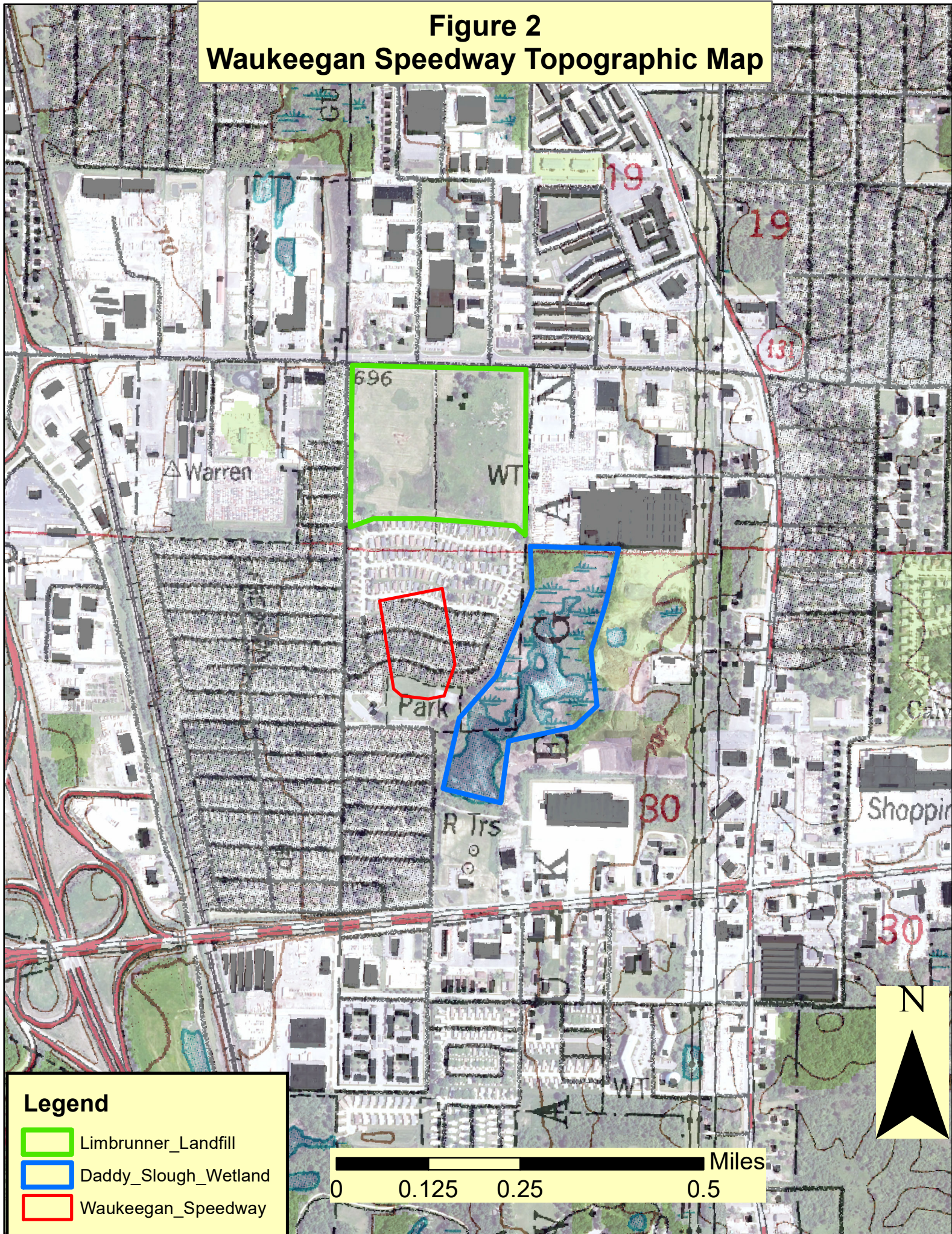


**Figure 3**  
**Waukeegan Speedway Site Map**





**Figure 2**  
**Waukeegan Speedway Topographic Map**





**Figure 4**  
**2019 Limbrunner Sampling Points**

**Legend**

- Point\_ge
- SEDIMENT
- SOIL

X105  
PCB Contamination  
3 times background  
0.053 mg/kg

X101  
PCB Contamination  
3 times background  
and above SCDM  
values of 1 mg/kg  
for soil.  
11 mg/kg

X103 and X104  
PCB Contamination  
3 times background  
0.140 and 0.180 mg/kg respectively

X202  
PCB Contamination  
3 times background  
0.110 mg/kg

0 230 460 920 1,380  
Yards

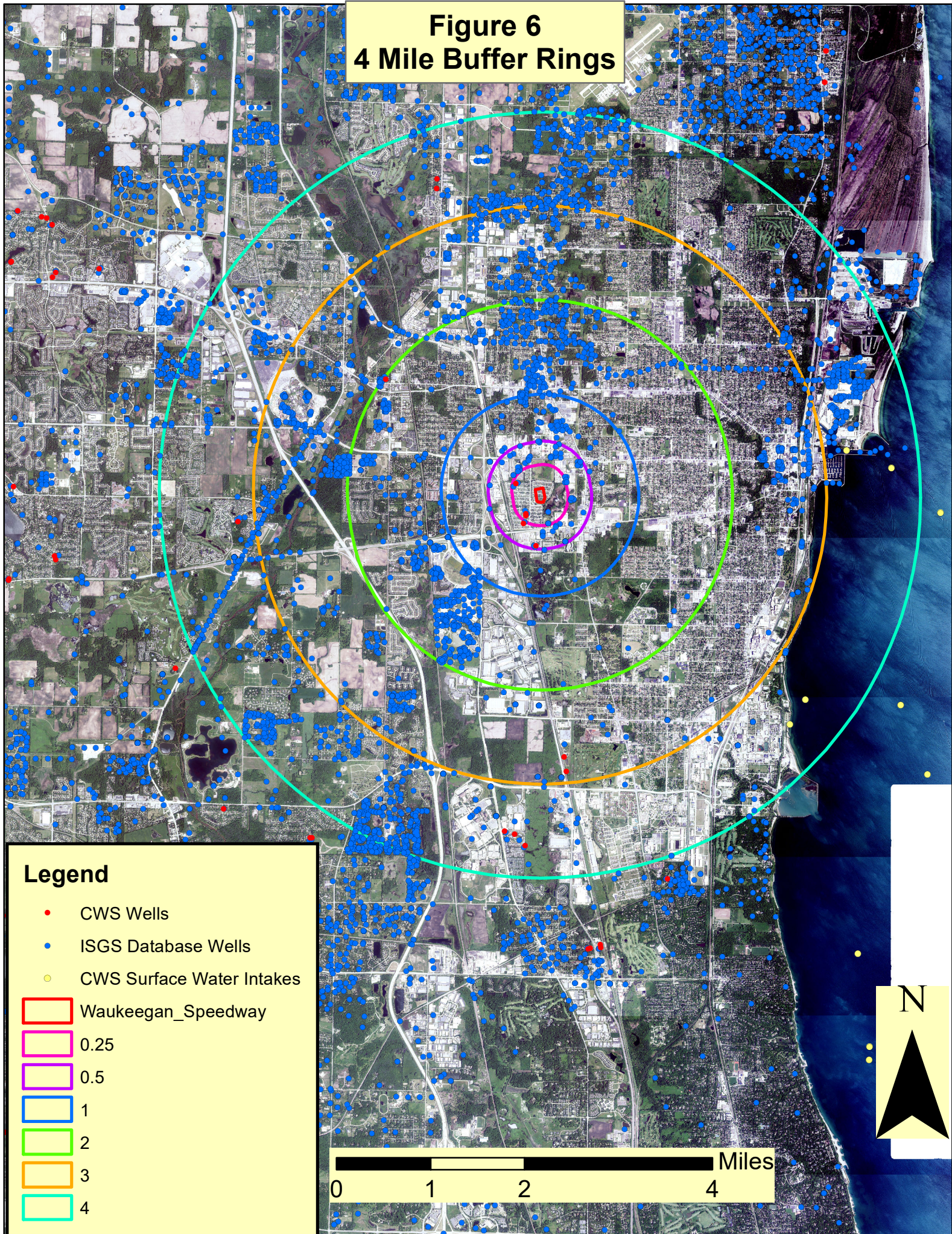


**Figure 5**  
**1978 Waukeegan Speedway Map**





**Figure 6**  
**4 Mile Buffer Rings**





**Figure 7**  
**15-Mile Target**  
**Distance Limit (TDL)**

